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February 1, 2021

VIA ECF

United States District Court
Honorable Vernon S. Broderick
40 Foley Square
New York, NY 10007

APPLICATION GRANTED

SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 2/2/2021

The post discovery status conference scheduled for
February 4, 2021, is adjourned to May 27, 2021, at
2:00 p.m.

Re: *Sekosan v. A Bronx's Women's Med. Pavillion P.C., et al.* – No. 19-cv-11313
Letter Motion to Extend Discovery and Adjourn Status Conference

Dear Judge Broderick,

This firm represents the plaintiff Marjana Sekosan in the above-referenced civil action. I submit this Letter Motion seeking an additional 120 days to complete discovery and an adjournment of the Status Conference scheduled for February 4, 2021. On August 31, 2020, this Court referred this matter to Magistrate Judge Ona T. Wang for a settlement conference. Since that time, the parties have conferred with Judge Wang concerning what documents were needed for a productive settlement conference and other logistical matters. Unfortunately, individual defendant Dr. Park, who is the principal of the corporate defendant, has suffered from medical hardships that have delayed the production of the documents and information that Judge Wang requested that defendants produce prior to the settlement conference. As such, a conference to discuss further logistics and the settlement conference itself have been adjourned by Judge Wang with the next conference set to take place on March 16, 2021 (ECF Docket No. 26).

As such, in order to preserve the resources of the parties and the Court, plaintiff respectfully requests that the time to complete discovery is extended by 120 days to May 25, 2021, and that the Status Conference scheduled for February 4, 2021 is adjourned to a date subsequent to the close of discovery. This is the first request for such relief. Counsel for defendants has consented to this request. Thank you for the Court's time and attention to this matter.

Respectfully submitted,

LEVINE & BLIT, PLLC

/s/ Justin S. Clark